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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION**

ELIZABETH HUNTER, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION; and  
SUZANNE GOLDBERG, in her official  
capacity as Acting Assistant Secretary for the  
Office for Civil Rights, U.S. Department of  
Education, *et al.*,

Defendants.

Civil Action No. 6:21-cv-00474-AA

**UNOPPOSED JOINT MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO MOTION TO INTERVENE BY  
RELIGIOUS SCHOOLS**

The parties, Elizabeth Hunter *et al.* (“Plaintiffs”) and the United States Department of Education and Suzanne Goldberg, Acting Assistant Secretary for the Office for Civil Rights, U.S. Department of Education (“Defendants”), respectfully request an extension until June 8,

Unopposed Jt. Mot. Ext. Time Respond Mot.  
Intervene Religious Schools  
No. 6:21-00474-AA

2021, to file their responses to the Motion to Intervene as Defendants (ECF No. 8) (“Motion”) filed by Western Baptist College, d/b/a Corban University, William Jessup University, and Phoenix Seminary (“Religious Schools”) and, in support thereof, state as follows:

1. The Complaint in this action was served on the U.S. Attorney’s Office on April 9, 2021. Accordingly, Defendants’ answer or other response to the Complaint is due on or before June 8, 2021.

2. The Religious Schools filed their Motion to Intervene on April 9, 2021. The parties’ responses to this Motion would ordinarily be due on or before April 23, 2021.

3. As the Complaint was only recently filed, Defendants need additional time to research the facts involved in this case and analyze the legal issues before responding to the Motion. Defendants will be able to respond most effectively to the Motion at the same time they file their answer or other response to the Complaint, due on June 8, 2021.

4. The parties agree that the due date for Plaintiffs to respond to the Motion should coincide with Defendants’ due date.

5. Accordingly, the parties request an extension until June 8, 2021, to file their responses to the Motion.

6. Counsel for proposed Intervenors advised undersigned counsel by email on April 20, 2021, that the proposed Intervenors do not oppose this request.

WHEREFORE, for the foregoing reasons, the parties respectfully request an extension until June 8, 2021, to file their responses to the Religious Schools’ Motion to Intervene.

Dated: April 21, 2021

Respectfully submitted,

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/s/ Carol Federighi  
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